

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:20-CV-396-FL

SIAVASH MOJARRAD, Administrator of THE ESTATE OF SOHEIL ANTONIO MOJARRAD,	)	<b>APPENDIX OF EVIDENCE CITED IN CITY OF RALEIGH'S STATEMENT OF MATERIAL FACTS (Local Civil Rule 56.1(a)(5))</b>
Plaintiff,	)	
v.	)	
WILLIAM BRETT EDWARDS, <i>in his individual capacity and</i> CITY OF RALEIGH, NORTH CAROLINA,	)	
Defendants.	)	

Pursuant to Local Rule 56.1(a)(5), the City of Raleigh offers the following Appendix of all evidence cited in Defendant City of Raleigh's Local Rule 56.1 Statement of Material Facts:

<u>Ex. No.</u>	<u>Description</u>
1	City of Raleigh's Designation of Expert Witnesses dated August 16, 2021
2	Declaration of John Eric Combs dated April 5, 2022
3	Declaration of Isaac T. Avery, III dated March 24, 2022
4	Defendant William Brett Edwards' Expert Disclosures dated August 16, 2021
5	Declaration of John Ryan dated April 6, 2021
6	Plaintiff's Supplemental Rule 26(a) Disclosures dated June 16, 2021
7	Preliminary Report of Geoffrey P. Alpert dated June 14, 2021
8	Expert Report of Jeffrey J. Noble dated June 14, 2021
9	Rule 26 Report of Michael A. Jones dated June 16, 2021

- 10      Excerpts from Transcript of Video Conference Deposition of John J. Ryan dated November 8, 2021
- 11      Excerpts from Transcript of Videotaped Remote Deposition of Geoffrey P. Alpert, Ph. D. dated December 14, 2021
- 12      Excerpts from Remote Videotaped Deposition of Jeffrey J. Noble dated December 13, 2021
- 13      Excerpts from Transcript of Videotaped Video Conference 30(b)(5) and 30(b)(6) Deposition of City of Raleigh, North Carolina, by and through its representative Peter Rowland dated October 28, 2021
- 14      Exhibit 4 to Videotaped Video Conference 30(b)(5) and 30(b)(6) Deposition of City of Raleigh, North Carolina, by and through its representative Peter Rowland dated October 28, 2021
- 15      Excerpts from Transcript of Videotaped Video Conference 30(b)(5) and 30(b)(6) Deposition of City of Raleigh, North Carolina, by and through its representative Harvey Slade dated October 27, 2021
- 16      Excerpts from Transcript of Deposition of Michael Anthony Jones Vol. II Conducted Virtually on January 18, 2022
- 17      Excerpts from Transcript of Videotaped Video Conference 30(b)(5) and 30(b)(6) Deposition of City of Raleigh, North Carolina, by and through its representative Sherry Hunter dated October 29, 2021

In addition to the exhibits enumerated above, the following documents have previously been filed with the Court:

<b><u>D.E. No.</u></b>	<b><u>Description</u></b>
D.E. 38	Amended Complaint filed April 19, 2021
D.E. 62-1	Declaration of Ryan Wilson filed February 8, 2022
D.E. 62-2	Declaration of Robin L. Tatum

This the 7<sup>th</sup> day of April, 2022.

**CITY OF RALEIGH**  
**Robin L. Tatum**  
**City Attorney**

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 7<sup>th</sup> day of April, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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And I hereby certify that I have mailed the document to the following non CM/ECF participants:

This the 7<sup>th</sup> day of April, 2022.

**CITY OF RALEIGH**  
**Robin L. Tatum**  
**City Attorney**

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